

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL ROBERT PAPPAS,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC. and
EQUIFAX INFORMATION SERVICES,
LLC

Defendants.

Case No. 1:15-cv-08115

Hon. Judge Amy J. St. Eve

**PLAINTIFF’S PARTIALLY UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE OPPOSITION TO FEE APPLICATION**

Counsel for Plaintiff Michael Pappas and Sulaiman Law Group, Ltd. (“SLG”) hereby move for an extension of time to file their brief in opposition to the fee application of Experian and Jones Day in this matter, as grounds therefore, the undersigned states as follows:

1. The undersigned counsel was just retained to represent Pappas and SLG with respect to the recent sanctions ordered entered in this matter (DKT #142) and the recent fee application filed by Jones Day (DKT ##144, 147).
2. Pappas’ brief in opposition to the petition is currently due August 4, 2017.
3. Plaintiff is seeking this extension because of the total amount of hours, the total number of attorneys, and the total amount of fees set forth and requested in the fee application.
4. Experian’s counsel has requested \$255,270.13 in fees, for 11 different attorneys, with fee entries totaling over 600 hours. (DKT ##144, 147)
5. Undersigned counsel has requested that Jones Day and Experian agree to a 14-day extension to allow a full response to this application for fees.

6. Jones Day agreed to a 7-day extension, but opposed a 14-day extension.

7. In light of the amount of fees and the number of hours and attorneys set forth in the fee petition, Pappas and SLG believe that a 14-day extension is very reasonable, would not cause needless delay, and would allow for a full review of the records a complete response to the fee petition.

WHEREFORE, the undersigned counsel respectfully requests the Court extend the time for Pappas and SLG to respond to the fee petition in this matter to August 18, 2017.

Dated: August 3, 2017.

Respectfully Submitted,

/s/ Ross M. Zambon

Ross M. Zambon (#6294149)

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Attorney for Plaintiff

/s/ Nick Wooten

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, Ross M. Zambon, an attorney, certify that on August 3, 2017, I caused the foregoing **Plaintiff's Partially Unopposed Motion for Extension of Time to File Opposition to Fee Application** to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system.

/s/ Ross M. Zambon
Attorney for Plaintiff